

### **REMARKS**

Reconsideration of this Application is respectfully requested. Upon entry of the foregoing amendment, claims 1, 3-4,6-12, 14-22, 24-26, 28-29, 31-32, 34, and 41-47 are pending in the application, of which claims 1, 9, and 17 are independent. Claims 2, 5, 13, 37, and 40 have been canceled without prejudice to or disclaimer of the subject matter therein. Claims 42-47 are new. Claims 30, 36, and 38-39 are currently withdrawn. No new matter has been introduced into the claims by the foregoing amendment.

#### ***Interview Summary***

On behalf of the Applicant, the undersigned wishes to express appreciation to Examiner Mark Fadok for the courtesies extended during the telephonic interview conducted on August 19, 2008. During the interview, the election/restriction and the rejections under 35 U.S.C. § 103(a) were discussed. The Examiner indicated that features related to simulations run by the customer, if included in the independent claims, would likely make the independent claims non-obvious over the cited references.

#### ***Claims 1, 3-4, 6-12, 14-22, 24-26, 28-29, 31-32, 34, and 41-47 are Allowable Over Bellini and Combinations Thereof***

Claims 1-4, 5-7, 9-15, 17 and 41 are rejected under 35 U.S.C. § 103(a) over Bellini in view of U.S. Publication No. 20040019604 to Ballas et al. (hereinafter "Ballas"), U.S. Publication No. 2003/0225637 by Pemberton et al. (hereinafter "Pemberton"), U.S. Publication No. 2002/0116346 by Blankenstein et al. (hereinafter "Blankenstein"), and U.S. Publication No. 2004/0088422 by Flynn et al. (hereinafter "Flynn"). Claims 8, 16 and 18-35 are rejected under 35 U.S.C. § 103(a) over Bellini in view of Ballas, in view of Pemberton, and further in view of Official Notice. Claim 20 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Bellini in view of Ballas, in view of Pemberton, in view of Official Notice and further in view of U.S. Publication No. 2004/0103046 to Christoph et al. (hereinafter "Christoph").

As discussed during the interview, independent claims 1, 9, and 17 have been amended to overcome Bellini and combinations thereof by including subject matter from dependent claims 5 and 40 related to simulations run by a customer. Specifically, independent 1 has been amended to recite receiving, at a manufacturer's server, a change request associated with at least one product from a customer of the manufacturer. Independent claim 1 has also been amended to recite running a simulation, in response to a request from the customer via a remote client, to determine at least one impact of making the change request. Similarly, independent claim 9 has been amended to recite a simulation module at a manufacturer configured to be triggered by a customer from a customer site separate from the manufacturer to run a simulation such that the customer can determine at least one impact of the communication at the manufacturer. Finally, independent claim 17 has been amended to recite a computer-readable program means for a customer to run a simulation from a remote client to determine at least one impact at the manufacturer of a communication.

For at least the reasons stated above, the Applicant respectfully submits that independent claims 1, 9, and 17 are allowable over Bellini, and combinations thereof. Based at least on their dependence upon the independent claims, the various dependent claims are also allowable.

Thus, Applicant respectfully requests that the rejections under 35 U.S.C. § 103(a) be withdrawn and the claims allowed.

### **CONCLUSION**

Applicant believes that a full and complete response has been made to the outstanding rejections and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that further personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided. Prompt and favorable consideration of the claims is respectfully requested.

The Director is hereby authorized to charge any appropriate fees under 37 C.F.R. §§1.16, 1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 50-1283.


Dated: 9/15/2008

COOLEY GODWARD KRONISH LLP  
ATTN: Patent Group  
777 6<sup>th</sup> Street NW, Suite 1100  
Washington, DC 20001

Tel: (703) 456-8000  
Fax: (202) 842-7899

Respectfully submitted,  
**COOLEY GODWARD KRONISH LLP**

By:

  
\_\_\_\_\_  
Daniel M. Bennett  
Reg. No. 54,993